

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ALISON O'DONNELL,

Plaintiff,

vs.

**UNIVERSITY HOSPITALS HEALTH
SYSTEM, et al.,**

Defendants.

) CASE NO. 1:16-CV-2480
)
) JUDGE DONALD C. NUGENT
)
)
)
)
)
)
)
)
)

JOINT MOTION FOR PROTECTIVE ORDER

Pursuant to Rule 26(C) of the Federal Rules of Civil Procedure, Defendants University Hospitals Cleveland Medical Center (misnamed in the Complaint as University Hospitals Health System), Naveen Uli, Sumana Narasimhan, Rose Gubitosi-Klug, and William Rebello, move this Court to enter the attached Stipulated Protective Order in the above-captioned action to govern the use of confidential information in certain documents that will be produced during the course of discovery in this case.

Respectfully submitted,

/s/ Fred M. Bean

Brian D. Spitz
Fred M. Bean
The Spitz Law Firm, LLC
25200 Chagrin Blvd., Suite 200
Beachwood, OH 44122
Brian.Spitz@spitzlawfirm.com
Fred.Bean@spitzlawfirm.com

*Attorneys for Plaintiff
Alison O'Donnell*

/s/ Liana R. Hollingsworth

David A. Campbell (0066494)
Liana R. Hollingsworth (0085185)
Vorys, Sater, Seymour and Pease LLP
200 Public Square, Suite 1400
Cleveland, Ohio 44114
Telephone: (216) 479-6100
Facsimile: (216) 479-6060
Email: dacampbell@vorys.com
lrhollingsworth@vorys.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing *Joint Motion for Protective Order* was filed electronically on this 9th day of June 2017. Notice of this filing will be sent to all parties, when applicable, by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing system. If parties will not receive notice via the Court's electronic filing system, a true and correct copy of the foregoing will be served via regular United States Mail, postage prepaid, upon the following:

Fred M. Bean, Esq.
THE SPITZ LAW FIRM, LLC
25200 Chagrin Blvd., Suite 200
Beachwood, OH 44122
Fred.Bean@SpitzLawFirm.com

Attorney for Plaintiff Alison O'Donnell

/s/ Liana R. Hollingsworth
David A. Campbell, Jr. (0066494)
VORYS, SATER, SEYMOUR AND PEASE LLP
200 Public Square, Suite 1400
Cleveland, Ohio 44114

One of the Attorneys for Defendants